

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA

- v. -

JASON EDWARDS,

Defendant.

- - - - - x

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INDICTMENT

22 Cr. ____ ()

22 CRIM 487

COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From at least in or around December 2021 up to and including in or around March 2022, in the Southern District of New York and elsewhere, JASON EDWARDS, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that JASON EDWARDS, the defendant, and others known and unknown, knowingly would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial

institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Aggravated Identity Theft)

The Grand Jury further charges:

3. From at least in or around December 2021 up to and including at least in or around March 2022, in the Southern District of New York and elsewhere, JASON EDWARDS, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, EDWARDS used and aided and abetted the use of bank account numbers, debit card numbers, dates of birth, driver license numbers, and social security numbers of other individuals, in connection with the offense charged in Count One of this Indictment, knowing that these means of identification belonged to other people.

(Title 18, United States Code, Sections 1028A(a)(1) and 2.)

COUNT THREE
(Felon in Possession of a Firearm)

The Grand Jury further charges:

4. On or about March 10, 2022, in the Southern District of New York and elsewhere, JASON EDWARDS, the defendant, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm and ammunition, to wit, a Ruger LCP II .380 caliber semi-automatic pistol, a .380 auto caliber G.F.L. cartridge, and a .380 auto caliber X-Treme cartridge, all of which had previously been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1).)

FORFEITURE ALLEGATION

5. As a result of committing the offense charged in Count One of this Indictment, JASON EDWARDS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

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INDICTMENT

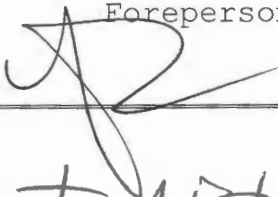
22 Cr. ____ ()

(18 U.S.C. §§ 1349, 1028A, 922(g), and 2.)

DAMIAN WILLIAMS
United States Attorney.

A TRUE BILL

Foreperson.



Filed Indictment
Case assigned to Judge Carter
No arrest warrants issued

9/14/22
KL

Stewart D. Aaron
U.S. M.J.